

Mr. Olin L. Greene, Director
Division of State Fire Marshal
Office of Treasurer
Insurance Commissioner
Tallahassee, FL 32304

Dear Mr. Greene:

This responds to your letter of November 15, 1974, requesting that we interpret 49 CFR 192.503(b) to permit the use of petroleum gas as a test medium.

Section 192.503(b) prohibits the use of petroleum gas as a test medium by exclusion from the list of permissible media. Consequently, this section cannot be interpreted to permit the use of petroleum gas.

We would be happy, however, to treat your letter as a petition to change the rule, if you will provide us further information to support your contention that petroleum gas as a test medium poses no greater hazard to the public than natural gas.

Sincerely,

/signed/

Joseph C. Caldwell
Director
Office of Pipeline Safety

November 15, 1974

Joseph C. Caldwell, Director
Office of Pipeline Safety
Department of Transportation
Washington, D. C. 20590

Request for an Interpretation on
Title 49-192.503(b) —

Dear Mr. Caldwell:

The test medium must be a liquid, air, natural gas, or inert gas that is:

1. Compatible with the materials of which the pipeline is constructed.
2. Relative free of sedimentary materials.
3. Except for natural gas, nonflammable.

We feel that when the standards were written, the use of LP Gas as a test medium was possibly overlooked.

In Florida, the State Fire Marshal's Office has permitted the use of LP Gas as a test medium and has had no accidents as a result of its use.

The LP Gas systems are small in comparison to natural gas transmissions and distribution systems and pipe size rarely exceeds two inches in diameter, therefore limiting the quantity of gas needed for a test. The LP Gas companies, as a rule, do their own piping and normally do not have access to an air compressor for pressuring the pipe.

We feel that the use of LP Gas as a test medium would constitute no more of a public safety hazard than the use of natural gas. We request that an interpretation be rendered permitting its use.

If we can be of assistance in any manner please let us hear from you.

Sincerely,

THOMAS D. O'MALLEY
STATE TREASURER
STATE FIRE MARSHAL

Olin L. Greene, Director
Division of State Fire Marshal